

IN THE MATTER OF THE SEARCH OF

THREE UNITED STATES POSTAL
SERVICE PARCELS LOCATED AT THE
INCOMING MAIL FACILITY IN
LINTHICUM HEIGHTS, MD

Misc. No. **19 - 1 4 2 9 JMC**

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR US MAIL PARCELS**

Your Affiant, Brett A. Willyerd, United States Postal Inspector, Baltimore, MD, being
duly sworn, does hereby depose and state:

I. Subject Parcels.

1. This is an Affidavit submitted in support of an Application for a Search Warrant for three (3) United States Mail parcels, hereinafter "SUBJECT PARCELS." These SUBJECT PARCELS are currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland. The SUBJECT PARCELS are specifically identified in Attachment A, which is incorporated herein by reference, for evidence of violations of 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute a Controlled Dangerous Substance), 21 U.S.C. § 843(b) (Transportation of Controlled Dangerous Substances via the U.S. Mail), and 21 U.S.C § 846 (Conspiracy to Distribute a Controlled Dangerous Substance). Those SUBJECT PARCELS are specifically identified as follows:

<i>Subject Parcel</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1.	(E) EE06363935SV	Karen Lisseth Sandoval Col. Omar POE 7 Block 9, Casa #6 APOPA S.S San Salvador, El Salvador.	Juan Antonio Garcia 439 N. Frederick Ave, Apt C6, Gaithersburg, MD 20877

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2.	(E) RR012349629SV	Flor Idalia Ivaheta Segouia Res. Altauista pasaje 8 su, Pol A Casa 95, Ilopongo s.s, El Salvador	Irma Evelin Towes Alvavenga 466 Captains Cir Apt A Annapolis, MD 21401
3.	(E) EE016350260SV	Arvin Baners Lista de Caner, San Salvador, El Salvador	Elma Antouis Lopez 112 Conley Dr. Annapolis, MD 21403

II. Affiant's Training and Experience.

2. Your Affiant, Brett A Willyerd, has been a United States Postal Inspector since April 2012. As part of my duties, I investigate the use of the United States Postal Service ("USPS") to illegally mail and receive controlled substances, the proceeds of drug trafficking, and instrumentalities associated with drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute controlled substances) and 843(b) (unlawful use of a communication facility, including USPS, to facilitate the distribution of controlled substances). I have participated in interdictions and controlled deliveries related to narcotics investigations. I have completed United States Postal Inspection Service (USPIS) Basic Inspector Training in Potomac, Maryland. I also have attended a one-week specialized training course presented by the USPIS addressing narcotics investigations and current trends in narcotics mailings. I have also received training on the identification of controlled substances, interdiction of controlled substances and proceeds thereof. Prior to being a U.S. Postal Inspector I was a police officer with the Manassas City Police Department in Virginia. As a result of my training and experience, I am aware that Priority Mail Express, Priority Mail and First Class services are regularly used by narcotic traffickers to ship controlled substances and bulk cash through the U.S.

Mail.

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3. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were relayed to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

III. Characteristics Common to Packages that Contain Narcotics.

4. Based upon your Affiant's training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or the proceeds thereof (*i.e.*, US currency). These factors, more fully detailed below, are used to identify packages requiring further investigation. In the case of this search warrant, several of these factors were identified, and the package was alerted to by the drug detection canine. The most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

a. *Contrasts observed between legitimate business parcels and drug parcels:* As an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the system), the USPS offers Priority Mail Express and Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel online by its distinct Priority Mail Express tracking

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number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Priority Mail has a delivery service standard of 1-3 business days, but delivery within that time period is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel.

Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter by using cash or a credit card. Business Priority Mail Express parcels typically weigh no more than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically handwritten.

In my experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Priority Mail Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Priority Mail Express, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. I have seen packages sent by persons with names of celebrities, cartoon characters, or fictional names. More often a search of

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a law enforcement database reflects that there is no association between the name of the sender and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the receiving address. This allows the person receiving the package to claim that they did not know about its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Sender:* The fact that a package was sent from narcotics source states such as Arizona, California, Texas, Washington, Colorado, Puerto Rico and Florida (among others) can also indicate that the parcel contains controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, I have also observed excessive glue on the flaps of narcotics parcels as well.

g. *Click-N-Ship:* The USPS created Click-N-Ship as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their

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residence or business. Drug traffickers create Click-N-Ship accounts as a means of giving a legitimate appearance to their drug mailings. They create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona as a means to deter detection, as these other states are not usually considered “source” states for controlled substances. The postage labels are printed/typed, unlike the typical drug related mailing label which is handwritten.

4. It is your Affiant’s experience that when these factors are observed, a drug detection K-9 will likely “alert,” next to the parcel, indicating that the dog has detected the presence of narcotics. As a result, these factors become a reliable way to profile the parcels being shipped every day.

IV. Probable Cause

5. On April 18, 2019, postal inspectors observed each of the SUBJECT PARCELS had the following factors or suspicious characteristics are present in each of the SUBJECT PARCELS:

<i>Subject Parcel Express or Priority</i>	<i>From Source State:</i>	<i>Weight:</i>	<i>Label:</i>	<i>Senders name associated with address? Yes / No</i>	<i>Recipients name associated with address? Yes / No</i>	<i>Canine Alert?</i>
1. Express	NO-International	1 lb 15.3 ozs	Handwritten	Unknown-Foreign Address	No	Yes - Beny ¹

¹ “Beny” K9 #181068 was certified in March of 2019 to alert on odors of marijuana (THC), cocaine, heroin, methamphetamine, hash, fentanyl and ecstasy and is trained on a monthly basis to ensure his accuracy. Customs and Border Protection K9 Officer Terri Giannetti is the handler for “Beny”.

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2. Express	NO- International	1 lbs 15 ozs	Handwritten	Unknown- Foreign Address	No- not since June 2017	Yes – Beny
3. Express	NO- International	7 lbs	Handwritten	Unknown- Foreign Address	No	Yes – Beny

6. The suspicious characteristics listed above were identified while the SUBJECT PARCELS were in the mail stream. Therefore, on April 18, 2019 parcels 1 through 3 above was individually removed from the mail stream. At that point, law enforcement used standard protocol for canine detection to determine whether there was probable cause that the SUBJECT PARCELS contained narcotics. Specifically, after being removed from the mail stream, each parcel was individually placed in a secure area next to several other empty and unused boxes at the Incoming Mail Facility in Linthicum Heights, Maryland. On April 18, 2019, a narcotic detection canine, “Beny,” was brought forward to scan the group of boxes, which included each individual SUBJECT PARCEL and the empty and unused boxes placed around the SUBJECT PARCEL. The handler observed the canine and then informed agents whether the dog alerted on the SUBJECT PARCEL. This process was used for parcels 1 through 3 listed above and repeated for each and every SUBJECT PARCEL listed above. As indicated in the above chart, the drug detection dog alerted to the presence of narcotics in connection with each of the three (3) SUBJECT PARCELS.

V. Conclusion

7. Your Affiant submits that, based on the above indicators reflected on the SUBJECT PARCELS, my training and experience, and the alert of a trained canine on each of the packages, there is probable cause to believe that each of the above-described SUBJECT PARCELS contains

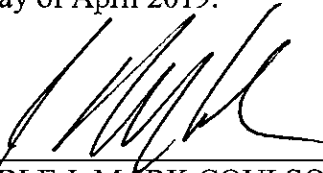
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narcotics or controlled substances, or the proceeds thereof (*i.e.*, United States currency) and/or materials relating to the distribution of controlled substances through the United States Mail.



Brett A. Willyerd
United States Postal Inspector

Subscribed and sworn to before me this 18 day of April 2019.



HONORABLE J. MARK COULSON
UNITED STATES MAGISTRATE JUDGE

FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____

MAY 01 2019

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ DEPUTY



ATTACHMENT A

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DESCRIPTION OF PARCELS TO BE SEARCHED

<i>Subject Parcel</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
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FILED _____ ENTERED _____
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MAY 01 2019

BY _____
 AT BALTIMORE
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF MARYLAND

DEPUTY
